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| UNITED STATES OF AMERICA | § | |
| V. | § | CRIMINAL NO. 1:15-CR-00162-SS |
| HELENA TANTILLO | § | |

MOTION TO ALLOW FILING OF MOTIONS IN LIMINE IMMEDIATELY PRIOR TO TRIAL - Page 1

file motions in limine immediately before trial as a result of information the Defendant anticipates may arise prior to trial. It is within the sole discretion of the trial judge of allow this as the trial judge has broad discretion over the trial timetable. *United States v. Bein*, 728 F.2d 107 (2nd Cir. 1984).

IV.

WHEREFORE, PREMISES CONSIDERED, the Defendant respectfully requests this Honorable Court to grant this motion and issue appropriate orders to enforce same.

Respectfully submitted,

BURLESON, PATE & GIBSON, L.L.P.

/s/ Michael P. Gibson

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COUNSEL FOR DEFENDANT
HELENA TANTILLO

CERTIFICATE OF CONFERENCE

This is to certify that the undersigned counsel conferred with Nicholas Bunch and Walt Junker, the Assistant United States Attorneys in charge of this case, and is authorized to state that the Government will file a written response pursuant to this Court's order.

/s/ Michael P. Gibson

MICHAEL P. GIBSON

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing motion was delivered by ECF filing to Nicholas Bunch and Walt Junker, the Assistant United States Attorney in charge of this case, 1100 Commerce, 3rd floor, Dallas, TX 75242, on this the 15th day of December, 2015.

/s/ Michael P. Gibson

MICHAEL P. GIBSON